

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

C.A. No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF ASIM M. BHANSALI IN SUPPORT OF DEFENDANT  
GOOGLE LLC'S MOTION TO STRIKE EXPERT REPORT OF SUNIL KHATRI, PH.D.**

I, Asim M. Bhansali, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am an attorney at the law firm of Kwun Bhansali Lazarus LLP. I represent Defendant Google LLC ("Google") in this case.

2. I make this declaration based on my personal knowledge and on a reasonable investigation of the facts relevant to this case. If called upon to testify regarding the facts in this Declaration, I am willing and able to do so.

3. Attached hereto as Exhibit 1 is a true and correct copy of the expert report of Dr. Khatri, without accompanying exhibits, which Singular served on December 22, 2022.

4. Attached hereto as Exhibit 2 is a true and correct copy of portions of the transcript of the deposition of Andy Phelps, taken July 14, 2021.

5. Attached hereto as Exhibit 3 is a true and correct copy of the supplemental infringement claim chart for the '156 Patent that Singular filed on August 11, 2022.

6. Attached hereto as Exhibit 4 is a true and correct copy of the supplemental infringement claim chart for the '273 Patent that Singular filed on August 11, 2022.

7. Attached hereto as Exhibit 5 is a true and correct copy of the preliminary infringement claim chart for the '156 Patent that Singular served on September 4, 2020.

8. Attached hereto as Exhibit 6 is a true and correct copy of the preliminary infringement claim chart for the '273 Patent that Singular served on September 4, 2020.

9. Attached hereto as Exhibit 7 is a true and correct copy of the "Materials Considered" list, attached as Exhibit B to Dr. Khatri's expert report, which Singular served on December 22, 2022.

Executed at San Francisco, CA on January 18, 2023.

/s/ Asim M. Bhansali  
Asim M. Bhansali

**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed